

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

HODELL-NATCO INDUSTRIES, INC., )  
et al. )

)

Plaintiffs, )

)

vs. )

SAP AMERICA, INC., et al., )

Defendants. )

)

)

)

CASE NO.: 1:08 CV 2755

JUDGE WELLS

**LSI-LOWERY SYSTEMS, INC.’S AND  
IBIS’ REQUEST FOR PRODUCTION  
OF DOCUMENTS TO SAP AND SAP  
AG**

**AND,**

**MOTION TO COMPEL**

Now come Defendants, LSI Lowery and IBIS hereby incorporate and adopt as their own all discovery propounded by plaintiff to SAP and SAP AG. Since it would be redundant and a waste of the parties' resources to reproduce the same requests and responses, unless specifically requested by SAP or SAP AG, this request will not be separately issued under the name of these requesting parties. Also, SAP and SAP AG need not separately respond to LSI's discovery requests.

In addition, these parties concur with and join in the Motion to Compel responses to discovery previously filed by Hodell-Natco Industries, Inc.

Respectfully submitted,

/s/ Roy A. Hulme  
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ROY A. HULME (0001090)  
REMINER CO., L.P.A.  
1400 Midland Building  
101 Prospect Avenue, West  
Cleveland, Ohio 44115  
Phone: 216/430-2135  
Fax: 216/430-2250  
E-Mail: [rhulme@reminger.com](mailto:rhulme@reminger.com)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing LSI-LOWERY AND IBIS REQUEST FOR PRODUCTION OF DOCUMENTS TO SAP AND SAP AG AND MOTION TO COMPEL was filed electronically this 15th day of March, 2012. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/ Roy A. Hulme  
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ROY A. HULME (0001090)